

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO

STATE OF NEW MEXICO, *ex rel.*  
State Engineer

Plaintiff,

vs.

ROMAN ARAGON, *et al.*,

Defendants.

69cv07941-BB

RIO CHAMA STREAM SYSTEM  
Section 7: Rito de Tierra Amarilla,  
Rio Brazos, Rutheron & Plaza Blanca,  
Cañones Creek, Village of Chama

**MOTION FOR DEFAULT JUDGMENT**

COMES NOW the plaintiff State of New Mexico, *ex rel.* State Engineer and moves the Court to enter its order granting default judgment against the following defendants:

Hope U. Martinez	CHTA-004-0027B
Juan I. Martinez	CHTA-004-0027B
Virginia McDermott	CHTA-004-0028
Tracy T. Howell	CHTA-004-0028
Joe I. Valdez	CHRB-004-0015
Tive Valdez	CHRB-004-0015
Verleen Bush	CHCV-002-0044
John Bush	CHCV-002-0044
Victoria L. Skron Dahl	CHCV-003-0028
Estate of Manuelita U. Abeyta	CHTA-003-0053

and as grounds therefore plaintiff states:

1. The defendants named above are in default for failure to appear, answer, or otherwise defend in this cause, as shown by the Clerk's Certificate of Default filed December 18, 2006 (Doc. No. 8519).

WHEREFORE, the plaintiff State of New Mexico requests the Court to enter its order granting default judgment against the above-named defendants incorporating the terms of the State's proposed consent orders and in conformance with the Office of the State Engineer Hydrographic Surveys for Section 7 of the Rio Chama Stream, as amended.

Respectfully submitted,

/s/ Ed Newville  
EDWARD G. NEWVILLE  
Special Assistant Attorney General  
Office of State Engineer  
P.O. Box 25102  
Santa Fe, NM 87504-5102  
(505) 867-7444

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 1 day of February, 2007 I filed the foregoing electronically through the CM/ECF system and served the following non-CM/ECF Participants in the manner indicated:

via first class mail, postage prepaid addressed as follows:

Hope U. Martinez  
Juan I. Martinez  
P.O. Box 1012  
El Prado, NM 87529

Virginia McDermott  
P.O. Box 984

Santa Fe, NM 87504

Tracy T. Howell  
P.O. Box 984  
Santa Fe, NM 87504

Joe I. Valdez  
Tive Valdez  
P.O. Box 454  
Española, NM 87532

Verleen Bush  
John Bush  
890 West Cliff Dr. #12  
Santa Cruz, CA 95060

Victoria L. Skrondahl  
8401 Spain Rd. NE, Apt. 50D  
Albuquerque, NM 87111

Estate of Manuelita U. Abeyta  
P.O. Box 124  
Tierra Amarilla, NM 87575

/s/ Ed Newville  
\_\_\_\_\_  
Edward G. Newville